

**Federal Defenders
OF NEW YORK, INC.**

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MEMORANDUM ENDORSED

September 3, 2024

By ECF

Honorable Gregory H. Woods
United States District Judge
Southern District of New York

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/3/2024

Re: *United States v. Marco Cintron*, 24 Cr. 495 (GHW)

Dear Judge Woods:

I write to respectfully request that the Court temporarily modify Marco Cintron's bond to permit him to travel to The Woodlands, Texas, from September 16–29, 2024. The purpose of the trip is to accompany his wife as she undergoes surgery—Mr. Cintron wishes to be present during the surgery and to help care for her afterward.¹ The Government consents to this request. Pretrial Services opposes because “[t]he defendant’s location monitoring condition—which our office believes is necessary to reasonably assure the defendant’s appearance in court and the safety of the community—would be unmonitored, or at best not effectively monitored, during this time.” Pretrial notes, however, that Mr. Cintron has been fully compliant with all bail conditions.

Mr. Cintron is charged with possession of a firearm after a felony conviction and unlawful delivery of firearms. He was released at his presentment on June 5, 2024 on a set of bond conditions including, as relevant, electronic monitoring with a curfew and travel restricted to EDNY/SDNY.

The Court should grant Mr. Cintron’s travel request where he is his wife’s primary caretaker and where he has been fully compliant with all of his bond conditions for the past three months. As his wife’s surgeon reports, Mr. Cintron’s presence during and after the surgery will be important “for his wife’s full recovery.” Letter of Wilberto Cortes, MD (Ex. A). If this request is granted, Mr. Cintron will of course provide Pretrial with all itinerary and contact information during his time in Texas.

¹ The surgery is [REDACTED].

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Thank you for your attention to this request.

Respectfully submitted,

/s/ Jonathan Marvinny
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cc: Getzel Berger, Esq.
Jonathan Lettieri, Pretrial Services

Application granted. The conditions of the defendant's release are modified as follows: Mr. Cintron may travel to The Woodlands, Texas to accompany his wife from September 16 through September 29, 2029. Mr. Cintron should provide all details of his travel plans to Pretrial Services as directed. All other conditions of Mr. Cintron's release remain in full effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 17.

SO ORDERED.

Dated: September 3, 2024
New York, NY



GREGORY H. WOODS
United States District Judge